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14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 ROSEN MARIANO, an individual,

17 Plaintiff,

18 vs.

19 THE CITY OF LAS VEGAS, a political
 20 subdivision of the State of Nevada;
 21 CORRECTIONAL HEALTHCARE
 COMPANIES, INC., a foreign corporation;
 22 CORRECT CARE SOLUTIONS, LLC, a
 23 foreign limited liability company; MICHELE
 24 FREEMAN, Chief of Detention Enforcement
 for the City of Las Vegas; CORRECTION
 OFFICER DOE 1-10; HEALTHCARE
 WORKER DOES 11-20; DOES 21-99;
 25 inclusive; ROE CORPORATIONS 100-199,
 inclusive,

26 Defendants.

1 CASE NO.: 2:18-cv-01911-APG-EJY

2 **STIPULATION AND ORDER TO**
EXTEND JOINT PRETRIAL ORDER
DEADLINE

3 **(SECOND REQUEST)**

27 ...

1 Pursuant to LR IA 6-1, the Parties, by and through their undersigned counsel of record,
2 hereby stipulate and request that this Court extend the deadline for filing the Joint Pretrial Order
3 ("JPTO") by a period of sixty (60) days, up to and including January 10, 2025, for the reasons
4 explained more fully below. This is the second request seeking an extension of the JPTO
5 deadline.

6 WHEREAS, on October 15, 2024, the Parties submitted their *Case Status Report*
7 requesting until November 12, 2024 to submit their Joint Pretrial Order (ECF No. 127).

8 WHEREAS, Mr. Lagomarsino and Ms. Phipps had just appeared on behalf of Plaintiff
9 the day before (ECF No. 126).

10 WHEREAS, Counsel for Defendant CCS took the lead on drafting the JPTO and
11 provided a draft on November 6, 2024.

12 WHEREAS, good cause for this extension exist to allow Plaintiff's new counsel to
13 devote the appropriate amount of time to the analysis of the matters within the JPTO which will
14 allow for streamlining the trial process and narrowing down the issues to be tried, and will be
15 unable to do so before the current deadline due to the extensive file review required on this case.
16 Additionally, counsel anticipates that the upcoming holiday schedules will delay this process.

17 WHEREAS, the Parties agree to the following deadlines:

18 • The Parties will disclose proposed exhibits on December 6, 2024.
19 • The Parties will exchange objections to proposed exhibits on December 13, 2024.
20 • The Parties will exchange proposed JPTO language on December 20, 2024.
21 • The Parties will conduct a telephone conference on January 3, 2025, to discuss the
22 final language to be incorporated JPTO language and any remaining issues.
23 • The Parties will file the JPTO by January 10, 2025.

24 ...

25 ...

26 ...

1 This request is made in good faith and not for purposes of delay.
 2

3 **IT IS SO STIPULATED.**

4 DATED this 6th day of November, 2024.

5 **LAGOMARSINO LAW**

6 _____
 7 /s/ Andre M. Lagomarsino
 8 ANDRE M. LAGOMARSINO, ESQ. (#6711)
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22 DATED this 6th day of November, 2024.

23 **LEWIS BRISBOIS BISGAARD & SMITH LLP**

24 _____
 25 /s/ Ethan Featherstone
 26 S. BRENT VOGEL, ESQ. (#6858)
 27 ETHAN FEATHERSTONE, ESQ. (#11566)
 28 6385 S. Rainbow Blvd., Suite 600
 29 Las Vegas, Nevada 89118
 30 *Attorneys for Defendant*
 31 *Correct Care Solutions, LLC*

32 DATED this 6th day of November, 2024.

33 **LAS VEGAS CITY ATTORNEY'S OFFICE**

34 _____
 35 /s/ Paul Mata
 36 PAUL MATA, ESQ. (#14922)
 37 495 S. Main Street, 6th Floor
 38 Las Vegas, Nevada 89101
 39 *Attorneys for Defendant*
 40 *City of Las Vegas and Michelle Freeman*

41 **ORDER**

42 **IT IS SO ORDERED.**

43 Dated: November 7, 2024

44 
 45 _____
 46 Layna L. Zouchah
 47 UNITED STATES MAGISTRATE JUDGE